

Excellence (POE). MVT owned the buses driven by Agent carrying Jane Doe at all relevant times in question. Fact issues for an expert to assist the trier of fact are: (1) whether Jane Doe was raped and (2) what psychological damages resulted, if any.

2. The original deadline for Defendants' expert designation was November 4, 2015 (DE 26).

3. On December 3, 2015, Dr. Crowder interviewed Jane Doe for an hour and spent 30 minutes talking to Jane Doe's mother Joyce Woodberry and family friend Betty Freeman with Jane Doe in the room. His objective was "to determine whether Jane Doe suffers from a psychiatric disorder which might have resulted from ['an alleged sexual assault']".

4. The original deadline for challenges to expert testimony was January 19, 2016.

5. On March 4, 2016, the Court extended Defendants' expert designation to March 15, 2016 (DE 186).

6. On March 7, 2016, Plaintiff received the Report of Defendants' expert psychiatry Dr. J. Douglas Crowder.

7. On March 31, 2016, the Court vacated all pretrial deadlines (DE 203).

8. On May 26, 2016, Plaintiff deposed Dr. Crowder.

9. In the absence of a set trial date and because Defendants were allowed to extend their expert deadline beyond the deadline for challenging experts,

allowing Plaintiff to file her Motion to Limit Dr. Crowder's testimony will not unduly prejudice Defendants.

10. Plaintiff's Motion to Limit the Testimony of Dr. Crowder is attached as **Exhibit 1**.

10. This request is not made for delay but so justice may be had.

WHEREFORE, Plaintiff respectfully requests the Court grant this Motion to allow Plaintiff to File her Motion to Limit Testimony of Dr. J. Douglas Crowder.

Respectfully submitted,

TURLEY LAW FIRM

/s/ T Nguyen
T Nguyen
State Bar No. 24051116

Mimi Ghassemi
State Bar No. 24091257
6440 North Central Expressway
1000 Turley Law Center
Dallas, Texas 75206
Telephone No. 214/691-4025
Telecopier No. 214/361-5802
Email: tn@wturley.com and mimig@wturley.com

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I hereby certify that Plaintiff's counsel conferred with Defendants' counsel; and Defendant DART has no position on this matter; Defendant POE is opposed; and Defendants MVT and Agent are opposed.

/s/ T Nguyen
T Nguyen

CERTIFICATE OF SERVICE

The foregoing document was caused to be filed into the Federal CM/ECF electronic filing system, which will serve all counsel of record on this 10th day of August, 2016.

/s/ T Nguyen
T Nguyen